

Baker Hostetler

Baker & Hostetler LLP

191 North Wacker Drive
Suite 3100
Chicago, IL 60606-1901

T 312.416.6200
F 312.416.6201
www.bakerlaw.com

July 25, 2011

BY ECF

George J. Tzanetopoulos
direct dial: 312.416.6225
gtzanetopoulos@bakerlaw.com

Honorable Roanne L. Mann
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

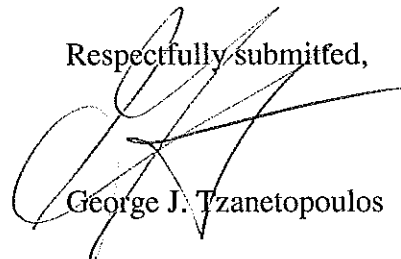
*Re: Ross University. v. Brooklyn-Queens Health Care Inc.
No. 09 Civ. 1410 (KAM) (RLM)*

Dear Judge Mann:

Pursuant to the Court's order of July 20, 2011, counsel for the parties have conferred and propose the following schedule for expert disclosure and depositions:

- (1) Rule 26(a)(2) disclosures and initial reports for all parties shall be served no later than August 31, 2011;
- (2) Any rebuttal expert disclosures and/or reports shall be served no later than September 30, 2011;
- (3) Depositions of experts shall be concluded by October 21, 2011; and
- (4) Status conference and trial date setting to be ordered at the Court's convenience thereafter.

Respectfully submitted,



George J. Tzanetopoulos

cc: Walter P. Loughlin